

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

NICK MEINTANAS,)	
Plaintiff,)	CIVIL ACTION NO.
v.)	
)	
GEORGIA PANAGIOTA LIMNOU)	
MARIA KARKOULI)	
GEORGIA IOANA)	
AND)	
ANGELOS MARFOPOULOS)	
Defendants)	

COMPLAINT AND JURY DEMAND

Introduction

1. Plaintiff Nick Meintanas, brings this action to recover damages as against Georgia Panagiota Limnou, Maria Karkouli, Georgia Ioana and Angelos Marfopoulos as it relates to a) real property in the Country of Greece that these individuals caused to fabricate false facts for purposes of the real estate to change title. In addition, plaintiff is seeking further damages for defamation and fraud.

Further, plaintiff is seeking damages for b) malicious prosecution as it relates to all defendants above. Plaintiff has independently confirmed that Defendant converted those

funds for personal use and in essence committed theft and was unfairly enriched to the detriment and reliance of plaintiff.

2. As a result, plaintiff lost title to real property improperly and had his reputation slurred and damages by the actions of all the defendants including being maliciously prosecuted as a result of their direct actions beyond the scope of any color of title they may purport.
3. Defendant Limnou had a special relationship of confidence with plaintiff and was entrusted and confided with certain scopes of work and subsequently betrayed and violated the trust and special relationship (confidential documents and emails) with

plaintiff for personal gain and benefit and subsequently as acting as opposing counsel to plaintiff

4. Further the defendants were directly behind the hacking and the illegal acquisition of communications of the plaintiff and his minor son Dimitri, in that they caused to have placed a “bug” on the phone of Dimitri that father had entrusted to him and like the predator spy ware were able to hear and observe all interactions of father and son and not limited too.
5. Plaintiff sees among other forms of relief, mandatory trebling of damages, liquidated damages, interest, and attorneys’ fees and costs, as provided for by the law.

Parties

6. Plaintiff Nicholas Meintanas is an adult US citizen working abroad with current residency in Boston, Massachusetts at One Shipway Place, Apartment C1a with zip code 02129.
7. Defendant Georgia Panagiota Limnou is a legal resident of the Country of Greece at Lambrou Katsoni 27, Athens.
8. Defendant Maria Karkouli is a legal resident of the Country of Greece at Lambrou Katsoni 27, Athens.
9. Defendant Georgia Iona is a legal resident of the Country of Greece at Lambrou Katsoni 27, Athens.
10. Defendant Aggelos Morfopoulos is a legal resident of the Country of Greece at Lambrou Katsoni 27, Athens.

Jurisdiction and Venue

11. This Court has Jurisdiction in that the Plaintiff is a resident of the Commonwealth of Massachusetts and The Defendants are residents of the Country of Greece. (Diversity of Citizenship)
12. The said money transactions amounted to over \$75,000.00 and come from revenue that plaintiff had made as a US citizen and invested.
13. Venue is proper in Massachusetts in light of paragraph 6 above.

Factual Allegations

14. Plaintiff Nick Meintanas (hereafter “Nick”) and Defendant Limnou (hereafter “Limnou”) knew each other through common friends and she became entrusted with Nick Meintanas.
15. Plaintiff and Defendant Georgia Panagiota Limnou were not related nor friends, rather Limnou was the attorney for the in-laws and former spouse of Nick (mother of minor son Dimitri).
16. All the defendants individually and collectively caused malice, deception, fraud, fabricated facts in order to incarcerate, defame and otherwise cause economic and mental harm to Nick and all were affiliated with common law practices.
17. Limnou upon information and belief has told third parties racist remarks such as “ I will get the faggot (fucken) American. I will send him back to America (deport him). I will

put him in prison (incarcerate him in Greece). I will make sure he never sees his son (minor Dimitri).”

18. Limnou and other defendants caused to provide a false address of Nick in Greece so that he may not receive proper notice of legal proceedings and to be adjudicated in abstentia as it relates to two independent matters. A) the foreclosure attempt of his ex spouse as to real property he had paid over \$135,000.00 in Northern Athens, on Leoforos Pentelis, Vrillissia and as it relates to charges they both had falsely fabricated that Nick had “stolen the passports of his minor son” (Nick was vindicated in criminal proceedings) As to the real estate the foreclosure went through and Nick has incurred over \$40,000 in legal fees trying to reverse on top of the \$135,000.00 expended in this real estate investment. A formal legal Demand letter the equivalent of a 93A letter was sent to the Defendants (hereafter referred to as a EXODIKO).
19. As a result of Defendants actions the police in Greece had warrants for plaintiff’s arrest and were looking for him unbeknownst to him and caused much personal insult, trauma and turmoil until he was vindicated in the long Greek litigious Greek Court system.
20. Individually and collectively they (defendants) made accusations in writing and verbal such statements that are defamatory, insulting wholly false and for the sole purpose of discrediting me and causing me harm. Said actions did cause harm. For instances some of their fabricated and dissemination of false facts where as to plaintiff as follows: “ He is dangerous, he psychologically abuses his son. That he is physically violent and that he is involved in the underworld with dubious dangerous persons and will kidnap his son and many more characterizations”.
21. Defendants’ primary collective acts were from June 1, 2020 until May 31, 2022.

22. Defendants' caused to have confiscation of real estate for debt of less than 10,000 and a loss of real property valued over \$135,000.00 by giving false notice (to the Courts and Court process servers and police) of my legal address as being the residence of my former in laws home (Aksiou 4, Vrillissia, Gr 15235) which happens to be the parents of my estranged ex wife who was the moving party to try to foreclose on real property I have spent or paid over \$135,000.00 to said family. Thus proceeding to a questionable and false foreclosure and loss of property on a judgment of \$10,000.00 without making demand for payment.
23. Defendants made false representations that son of Nick did not want to be with father.
24. Defendant Limnou caused the creation and production of false witnesses or witnesses against plaintiff Nick and was bold enough to have as such witnesses two of her colleagues at her law office that neither know him or had any interaction with him. Something that in the US would be considered illogical, impractical and a non percipient tainted witness with a conflict of interest.
25. Defendant Limnou further created and caused to be filed conflicting representations in the Courts of Greece as against a US citizen (Nick) such as, on one occasion she falsified facts such as created, presented and had his former father in law sign two affidavits claiming in one that " Nick did not have any money" then in other affidavit contradicting and proceedings to attest that Nick was making \$10,000 a month. All this under the direct creation, control and devise of defendant Limnou who created and caused to have these affidavits presented.
26. Defendant Limnou concealed and misrepresented that plaintiff's minor son Dimitri was not a US Citizen and did this solely for her financial gain and to harm Nick and his

relationship with his son as well as impede the child from his birth rite to wit, the protection of a US citizen by US authorities.

27. Defendant Limnou further made representations of false nature alleging the potential kidnaping of the child and causing to have an “Amber” alert for the child in order to impeded said US citizen child to leave the country of Greece.

28. Defendant Limnou and Karkouli caused to orchestrate and retain a private psychologist named Niki Basileiou for the sole purpose to influence her personal friend the judge that was handling the custody matter of my son at the time. Said Judge did not recuse herself and only did so recently after Plaintiff initiated proceedings against Basileiou when it became clear plaintiff was not going to allow a miscarriage of justice. However, the plaintiff did have intentional delay and improper actions orchestrated as a result of defendants coordinated actions. To wit the case involving Basileiou was delayed and continued indefinitely (for numerous years) after it was determined that plaintiff’s son wished to be primarily with him and to go the US thus blocking his development and advancement by having access to the United States of America.

29. Plaintiff’s business/company loosed sales and client base as a result of Defendants actions in an amount over \$300.000.00 out of pocket and millions of potential future revenue.

**COUNT I
MALICIOUS PROSECUTION**

30. Plaintiff hereby avers and incorporates paragraph one thru twenty-eight above.
31. Plaintiff had multiple criminal matters created and developed and advanced by the defendants again him.
32. Said criminal matters were resolved in plaintiff's favor after litigation and full hearing, trials.
33. The defendants did not have probable cause or reasonable grounds to support the criminal cases against plaintiff.
34. Defendants' are liable to Plaintiff for the full amount of monies including incidental damages, in an amount to be determined at trial, plus an additional equal amount as liquidated damages, plus the costs and reasonable attorneys' fees incurred by Plaintiff in bringing this action.
35. Plaintiff believes that the amounts of damages are at least four million USD as to this count.

**COUNT II
FRAUD/DECEIT**

36. Plaintiff hereby avers and incorporates paragraph one thru thirty-four above.
37. Defendants made multiple material misrepresentations as it relates to plaintiff as referenced herein this complaint.

38. Defendants' material misrepresentations were made to induce action to the detriment of plaintiff.

39. As a result of those material misrepresentations made to induce action there was reasonable reliance on the false statements at the detriment of the plaintiff.

40. Defendants is liable to Plaintiff for the full amount of monies including incidental damages, in an amount to be determined at trial, plus an additional equal amount as liquidated damages, plus the costs and reasonable attorneys' fees incurred by Plaintiff in bringing this action.

41. Plaintiff believes that the amounts of damages are at least four million USD as to this count.

COUNT III CONVERSION

42. Plaintiff hereby avers and incorporates paragraph one thru thirty-four above.

43. Defendants intentionally deprived Plaintiff of use and possession of his personal property, the real estate and acted to convert it to as to possession and legal title.

44. Defendants acts of conversion with deception/fraud constitute criminal conversion and Plaintiff is seeking punitive damages to be awarded against the Defendants.

45. Defendants' are liable to Plaintiff for the full amount of monies including incidental damages, in an amount to be determined at trial, plus treble damages, plus the costs and reasonable attorneys' fees incurred by Plaintiff in bringing this action.

46. Plaintiff believes that the amounts of damages are at least four million USD as to this count.

**COUNT IV
DEFAMATION**

47. Plaintiff hereby averts and incorporates paragraph one thru forty-six above.
48. In furtherance of Defendants objectives to financially harm and otherwise incarcerate the Plaintiff the Defendants caused to have malicious prosecution of the Plaintiff in the Courts.
49. The theft allegations of passports were the underlying basis of the malicious prosecution, and the plaintiff was successful after trial in getting a not guilty.
50. Defendants has intentionally and falsely defamed Plaintiff and as a result, public newspapers, social media and governmental administrative bodies picked up the false allegations.
51. Plaintiff Nick as result had a loss of focus and clientele and stream of income as result of these allegations that were presented by Defendants.
52. Said Defamation has caused significant financial loss, loss of time, loss of freedom and loss of reputation and all are a direct result of the false allegations propounded by the Defendants
53. Defendants' is liable to Plaintiff for the full amount of monies including incidental damages, in an amount to be determined at trial, plus treble damages, plus the costs and reasonable attorneys' fees incurred by Plaintiff in bringing this action.
54. Plaintiff believes that the amounts of damages are at least eight million USD as to this count.

**COUNT V
RICO**

55. Plaintiff hereby avers and incorporates paragraph one thru fifty-four above.
56. Defendants conduct as professionals within the same office as it relates to plaintiff constituted a common enterprise.
57. Defendants conduct was a pattern of fabrication of facts and deception of legal residence of a US Citizen, the plaintiff for purposes of financially harming him, alienating him from his son and ultimately incarcerating him if he did not flee the Country of Greece.
58. The collective actions of the defendants which included hiring persons who had a close relationship with judges for purposes of advancement of their professional “wins” constitutes racketeering activity.
59. Defendants, on multiple levels fabricated facts against Plaintiff and all had a pecuniary interest in advancing criminal prosecution of plaintiff, destruction of his business,

acquisition or loss of his real estate and influencing officials through bribery (use of acquaintances)

60. Defendants' is liable to Plaintiff for the full amount of monies including incidental damages, in an amount to be determined at trial, plus treble damages, plus the costs and reasonable attorneys' fees incurred by Plaintiff in bringing this action.

61. Plaintiff believes that the amounts of damages are at least twelve million USD as to this count.

PRAYERS FOR RELIEF

WHEREFORE, Plaintiff requests that this Court enter the following relief:

- A. Determine the damages sustained by the Plaintiff as a result of Defendants' violations, including federal and state laws, rules, and regulations and award those damages against
- B. the Defendant in favor of Plaintiff, plus additional liquidated and treble damages (punitive) and interest as provided for by law;
- C. Award Plaintiff costs of this suit, including, without limitation, reasonable attorneys' fees; and
- D. Any other or further relief as the Court may deem just and proper.

PLAINTIFF DEMANDS A JURY TRIAL ON ALL CLAIMS SO TRIABLE

NICK MEINTENAS
By His Attorney

/s/ Demetrios G. Kafkas

Demetrios Kafkas, BBO#565566
Kafkas Law Offices
The Charlestown Navy Yard
C1 Shipway Place
Charlestown, MA 02129
Tel: 617-800-6932
Email: Kafkaslink@ahoo.com

Dated: August 25, 2022

EXHIBIT A

STATEMENTS/REPORTS

Multiple documents in the Greek language to be translated as the case develops and make part of the record.